

BEFORE THE
POSTAL RATE COMMISSION
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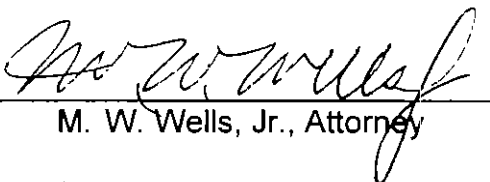
FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS NORMA B. NIETO
USPS-T-2

FGFSA/USPS-T2-48-55

SEPTEMBER 16, 1997

Florida Gift Fruit Shippers Association, (FGFSA) hereby submits the attached interrogatories to USPS Witness Nieto (USPS - T -2), and requests a timely and full response under oath.

Florida Gift Fruit Shippers Association

By 
M. W. Wells, Jr., Attorney

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Interrogatories to Witness Nieto, USPS-T2

FGFSA/USPS-T2-48

Assume that there are two identical parcel post parcels (each parcel being 1 ft x 2 ft x 1 ft) , and each parcel having a weight of 20 lbs.. Two of these parcels are placed in each of two trailers (40 ft. x 8 ft. x 7 ft.), for Intra-BMC transportation, and that both parcels are sampled at the place of unloading in the TRACS program. In trailer No. 1, the two parcels are placed on the floor of the trailer, side by side. In trailer No. 2, the two parcels are placed on the floor of the trailer, one on top of the other. No other mail is placed on top of the parcels in either trailer.

- a) Explain the computation to record the actual cubic feet of each parcel.
- b) Explain how the cubic feet of each parcel is "expanded" under the TRACS programs.
- c) How is the fact that the two parcels are stacked one on top of the other, recorded in the TRACS sample data?
- d) If the one trailer is 10% empty at the time of the TRACS sample, how does this affect the expanded cubic feet?
- e) If the one trailer is 50% empty at the time of the TRACS sample, how does this affect the expanded cubic feet?
- f) Will the cubic feet of the two parcels be the same under each a) and b) above? If not, explain why there is a difference.

FGFSA/USPS-T2-49

Please confirm that the amounts shown for PERCONT in the percentage of the container filled with items of the same item type. If you do not confirm, please provide the correct terminology.

- a) Is the "item type" the same as "mailcode"? If not, please explain.
- b) Confirm that the cubic feet occupied by the sampled mail is expanded to the container level in EXPAND(HWY1) If not, where does this expansion occur?
- c) In the expansion to the container level, how is the amount shown as PERCONT taken into account?
- d) If the PERCONT is shown to be 55, will only 55% of the standard cubic feet of the container be taken into account? If not, please explain.

FGFSA/USPS-T2-50

Please refer to the qtr 1 records for TESTID 09306AG. Please confirm:

- a) This sampling occurred at a BMC on an inbound movement.
- b) The sample from container no. 1 shows:
 - i. The PERCONT was 55

- ii. 1 piece of mailcode P, having a weight of 7.1875 pounds
 - iii. The calculated cubic feet of the sample is 1.02444 cu. Ft.
 - iv. The expanded cubic feet, in EXPAND(HWY1), is 110.610.
- c) The sample from container no 2 shows:
 - i. the PERCONT was 75.
 - ii. 1 piece of mailcode P, having a weight of 1.3125 pounds
 - iii. The calculated cubic feet of the sample is 0.18707 cu. Ft.
 - iv. The expanded cubic feet, in EXPAND(HWY1) is 110.610
- d) The sample from container no. 5 shows:
 - i. The PERCONT was 60.
 - ii. A piece of mailcode P, having a weight of 5.6875 pounds.
 - iii. The calculated cubic feet of the sample is 0.81065 cu. Ft..
 - iv. The expanded cubic feet, in EXPAND(HWY1) IS 110.610.
- e) The combined expanded cubic feet for the three containers (1, 2 &5) is 331.220 cu.ft.
- f) The combined cubic feet was further expanded, in EXPAND(HWY6), to a total of 1,620 cu. Ft.
 - i. explain why the 331.20 cu. Ft. was expanded to 1,620 cu. Ft, which is an expansion factor of 4.891.
- g) 1,620 cu. Ft. is the amount taken into account for these samples, after converting the cu. Ft. into cubic foot miles, in the determination of the distribution key.
- h) The sample from container no. 3 shows:
 - i. The PERCONT was 70.
 - ii. 1 piece of mailcode M, having a weight of 0.25 pounds.
 - iii. The calculated cubic feet of the sample is 0.01415 cu. Ft.
 - iv. The expanded cubic feet, in EXPAND(HWY1), IS 110.61.
- I) The sample from container no. 4 shows:
 - i. The PERCONT was 80.
 - ii. 1 piece of mailcode M, having a weight of 0.75 pounds.
 - iii. The calculated cubic feet of the sample is 0.04244 cu. Ft.
 - iv. The expanded cubic feet, in EXPAND(HWY1) is 110.61.
- j) The combined expanded cubic feet for the two containers (3 & 4) is 221.220.
- k) The combined cubic feet was further expanded, in EXPAND(HWY6) to a total of 1,080 cu. Ft.
 - i. Explain why the 221.220 cu. Ft. was expanded to 1,080 cu. Ft., which is an expansion factor of 4.882.

- l) 1,080 cu. Ft. is the amount taken into account for these sample, after converting the cu. Ft. into cubic foot miles, in the determination of the distribution key.
- m) Explain why the expansion factor used for mailcode P is different from the expansion factor used for mailcode M.

FGFSA/USPS-T2-51

Please refer to the qtr 1 records for TESTID 09336BE. Please confirm:

- a) This sampling occurred at a BMC on an inbound movement. And the vehicle was 70% empty.
- b) Three containers were sampled, each having a piece of mailcode P.
- c) The combined weights of the 3 sampled pieces was 16.6875 pounds.
- d) The combined calculated cubic feet of the sampled pieces was 0.99772 cu. Ft.
- e) The cubic feet for the samples was expanded, in EXPAND(HWY1), to 48.640 cu. Ft. for each sample, and, in EXPAND(HWY4) combined in the total of 145.920 cu. Ft.
- f) The combined cubic feet was further expanded, in EXPAND(HWY10) to a total of 1,885 cu. Ft.
- g) The total of 1,885, after being converted to cubic foot miles, is the amount taken into account in the determination of the distribution key.

FGFSA/USPS-T2-52

Please refer to the qtr I records for TESTID 09336JM. Please confirm:

- a) This sampling occurred at a BMC on an inbound movement.
- b) The sampling included a piece of mailcode U having a weight of 0.5 pounds.
- c) The sample mailcode U had a calculated cubic feet of 0.04870.
- d) When expanded in EXPAND(HWY1) this sample is shown to have cubic feet of 0.006.
 - i. explain why the calculated cubic feet is greater than the expanded cubic feet.
- e) When further expanded in EXPAND(HWY6) this sample is shown to have cubic feet of 0.06.
- f) The expansion of cubic feet from 0.006 to 0.06 reflects an expansion factor of 10.
- g) The sampling included 183 pieces of mailcode M having a weight of 8.125 pounds.
- h) The sampled mailcode M had a calculated cubic feet of 0.45974.
- i) When expanded in EXPAND(HWY1) this sample is shown to have cubic feet of 49.340.

- j) When further expanded in EXPAND(HWY6) this sample is shown to have cubic feet of 541.54.
- k) The expansion from 49.340 to 541.54 reflects an expansion factor of 10.97

FGFSA/USPS-T2-53

Please refer to the qtr 1 records for TESTID 70786RJ;

- a) The number 9 is recorded as SETASIDE. Explain what this refers to.
- b) The sample data is recorded and expanded as follows:

Mailcode	Freq	Calc cu.ft.	Expanded cu.ft.	
S	1	0.056	480.	EXPAND(HWY1) AND (HWY6)
S	3	3.353	1,112.80	(HWY6)
Q	2	0.239	79.83	(HWY6)
P	1	1.470	487.83	(HWY6)
J	2	2.512	240.	(HWY6)

- c) Explain why the expansion factor for each mailcode is different.

FGFSA/USPS-T2-54

Please provide, for each quarter in FY 1996, the TRACS data for account 53127, bound 1, account 53127, bound 2, and account 53131 showing for each mailcode the total number of pieces sampled, the weight of those pieces and the calculated cubic feet of those pieces.

FGFSA/USPS-T2-55

Please refer to Library Reference H-84. On CD 4 for PQ1 there can be accessed the file named: TRACSSMN.Z.HIGHWAY.PG*96.SURVEY.TEXT which is on the CD as \RATECLAS\TRACS\HIGHWAY\SURVEY\PQ*96__SU.DAT. However for PQs 2, 3 & 4, 1996, these files exist in the HIGHWAY directory, but not in the SURVEY directory, at least not in the format expected by the SAS programs. Please provide format directions to access these files for the three postal quarter, or provide whatever instructions or information necessary to do so.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding on this date in accordance with Section 12 of the Rules of Practice and Procedure.

Dated :September 16, 1997

M. W. Wells, Jr., Attorney